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Remarks

This Application has been carefully reviewed in light of the Final Office Action mailed June 14, 2004. Although Applicants believe all pending claims are allowable without amendment, to expedite issuance of a patent from this Application, Applicants have made clarifying amendments to independent Claims 1 and 9. These amendments are not narrowing and are not considered necessary for patentability. Applicants respectfully request reconsideration and allowance of all pending claims.

Claims 1-16 are Definite under 35 U.S.C. § 112 Paragraph 2

The Examiner rejects Claim 1-16 under 35 U.S.C. § 112 paragraph 2 as being indefinite. Specifically, the Examiner asserts that the limitation, "the identified customer service," recited in independent Claims 1 and 9 lacks antecedent basis. Although Applicants believe Claims 1 and 9 are definite under 35 U.S.C. § 112 paragraph 2 without amendment, Applicants have amended Claims 1 and 9 to further clarify that the previously recited "identified customer service" is "the customer service . . . identified as a result of the searching."

Claims 1-16 are Allowable over *Rangan*

The Examiner rejects Claims 1-16 under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. 6,594,766 B2 to Rangan et al. ("*Rangan*"). Applicants respectfully disagree with the Examiner. To maintain the rejection of Claims 1-16, the Examiner now asserts that:

- A** the personalized portal page in *Rangan* can be properly considered *a portal-page service*, as recited in independent Claims 1 and 9;
- B** the interface of the personalized portal page in *Rangan* can be properly considered *an interface bundle*, as recited in independent Claims 1 and 9;
- C** the method for storing personal web pages in *Rangan* can be properly considered *a customer service*, as recited in independent Claims 1 and 9;

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D the search function in *Rangan* can be properly considered *searching, by the portal-page service installed at the gateway, for the customer service installed at the gateway*, as recited in independent Claims 1 and 9;

E the interface of the Internet portal in *Rangan* can be properly considered *a user interface*, as recited in independent Claims 1 and 9; and

F the Internet portal in *Rangan* can be properly considered *a portal-page*, as recited in independent Claims 1 and 9.

These current assertions are discussed and refuted below, keyed by letter for the Examiner's convenience.

A The personalized portal page in *Rangan* cannot be properly considered *a portal-page service* as recited in independent Claims 1 and 9 unless *Rangan* at least discloses every one of the following limitations:

- *installing* the personalized portal page *at a gateway*, as recited in independent Claims 1 and 9;
- *searching, by* the personalized portal page, *for the customer service installed at the gateway*, as recited in independent Claims 1 and 9;
- *generating, by* the personalized portal page, *a user interface for the customer service installed at the gateway identified as a result of the searching based on the customer service installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9; and
- *generating, by* the personalized portal page, *a portal-page for the customer service installed at the gateway identified as a result of the searching based on the user interface generated for the customer service installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9.

Rangan fails to disclose, teach, or suggest any of the above limitations recited in independent Claims 1 and 9, much less every one of the above limitations.

First, *Rangan* fails to disclose, teach, or suggest *installing* the personalized portal page *at a gateway*, as recited in independent Claims 1 and 9. Instead, the Internet portal in *Rangan* merely presents the personalized portal page to a user from a server at an Internet Service Provider (ISP) separate from any gateway routers. (Column 4, Lines 37-41).

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Second, *Rangan* fails to disclose, teach, or suggest *searching, by* the personalized portal page, *for the customer service installed at the gateway*, as recited in independent Claims 1 and 9. Instead, *Rangan* merely discloses that the personalized portal page allows a user run a keyword search on web pages listed in the personalized portal page. Nowhere does *Rangan* disclose, teach, or even suggest that web pages listed in the personalized portal page can themselves be properly considered *the customer service installed at the gateway*, as recited in independent Claims 1 and 9.

Third, *Rangan* fails to disclose, teach, or suggest *generating, by* the personalized portal page, *a user interface for the customer service installed at the gateway identified as a result of the searching based on the customer service installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9. Instead, the personalized portal page in *Rangan* merely links a user to a web page in response to the user selecting a link in the personalized portal page to the web page. Nowhere does *Rangan* disclose, teach, or even suggest that the personalized portal page generates any subsequent interface, much less *a user interface for the customer service installed at the gateway identified as a result of the searching based on the customer service installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9.

Fourth, *Rangan* fails to disclose, teach, or suggest *generating, by* the personalized portal page in *Rangan*, *a portal-page for the customer service installed at the gateway identified as a result of the searching based on the user interface generated for the customer service installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9. Instead, as discussed above, the personalized portal page in *Rangan* merely links a user to a web page in response to the user selecting a link in the personalized portal page to the web page. Nowhere does *Rangan* disclose, teach, or even suggest that the web page to which the personalized portal page links the user can be properly considered *a portal-page for the customer service installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9. Even assuming for the sake of argument that the web page to which the personalized portal page links the user could be properly considered *a portal-page*

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for the customer service installed at the gateway identified as a result of the searching, Rangan would still fail to disclose, teach, or suggest generating the web page by the personalized portal page, as recited in independent Claims 1 and 9.

For at least these reasons, the personalized portal page in *Rangan* cannot be properly considered *a portal-page service* as recited in independent Claims 1 and 9.

B The interface of the personalized portal page in *Rangan* cannot be properly considered *an interface bundle* as recited in independent Claims 1 and 9 unless *Rangan* at least discloses every one of the following limitations:

- *installing* the interface of the personalized portal page *at a gateway*, as recited in independent Claims 1 and 9; and
- *installing a customer service at the gateway based on* the interface of the personalized portal page, as recited in independent Claims 1 and 9.

Rangan fails to disclose, teach, or suggest any of the above limitations recited in independent Claims 1 and 9, much less every one of the above limitations.

First, *Rangan* fails to disclose, teach, or suggest *installing* the interface of the personalized portal page *at a gateway*, as recited in independent Claims 1 and 9. Instead, as discussed above, the Internet portal in *Rangan* merely presents the personalized portal page to a user from a server at an ISP separate from any gateway routers.

Second *Rangan* fails to disclose, teach, or suggest *installing a customer service at the gateway based on* the interface of the personalized portal page, as recited in independent Claims 1 and 9. Even assuming for the sake of argument that the interface of the personalized portal page in *Rangan* provided access to a service, *Rangan* would still fail to disclose, teach, or suggest the accessible service *being* at all *based on* the interface of the personalized portal page, as recited in independent Claims 1 and 9. Moreover, assuming again for the sake of argument that the interface of the personalized portal page in *Rangan* provided access to a service, *Rangan* would still fail to disclose, teach, or suggest *installing*

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the accessible service *at the gateway*, as recited in independent Claims 1 and 9. As discussed above, the Internet portal in *Rangan* merely presents the personalized portal page to a user from a server at an ISP separate from any gateway routers.

For at least these reasons, the interface of the Internet portal in *Rangan* cannot be properly considered *an interface bundle*, as recited in independent Claims 1 and 9.

C The method for storing personal web pages in *Rangan* cannot be properly considered *a customer service* as recited in independent Claims 1 and 9 unless *Rangan* at least discloses every one of the following limitations:

- *installing* the method for storing personal web pages *at the gateway*, as recited in independent Claims 1 and 9
- the method for storing personal web pages *being based on the interface bundle*, as recited in independent Claims 1 and 9;
- *searching, by the portal-page service installed at the gateway, for* the method for storing personal web pages *installed at the gateway*, as recited in independent Claims 1 and 9;
- *generating, by the portal-page service installed at the gateway, a user interface for* the method for storing personal web pages *installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9; and
- *generating, by the portal-page service installed at the gateway, a portal-page for* the method for storing personal web pages *installed at the gateway identified as a result of the searching based on the user interface generated for* the method for storing personal web pages *installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9.

Rangan fails to disclose, teach, or suggest any of the above limitations recited in independent Claims 1 and 9, much less every one of the above limitations.

First, *Rangan* fails to disclose, teach, or suggest *installing* the method for storing personal web pages *at the gateway*, as recited in independent Claims 1 and 9. The method for storing personal web pages in *Rangan* merely includes portal software at a server

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providing a user a personalized portal page that contains links to listed web pages. As discussed above, the server resides at an ISP separate from any gateway routers.

Second, *Rangan* fails to disclose, teach, or suggest the method for storing personal web pages *being based on the interface bundle*, as recited in independent Claims 1 and 9. As discussed above, *Rangan* fails to disclose, teach, or suggest *an interface bundle*, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest the method for storing personal web pages *being based on the interface bundle*, as recited in independent Claims 1 and 9.

Third, *Rangan* fails to disclose, teach, or suggest *searching, by the portal-page service installed at the gateway, for the method for storing personal web pages installed at the gateway*, as recited in independent Claims 1 and 9. As discussed above, *Rangan* merely discloses the personalized portal page allowing a user to run a keyword search on web pages listed in the personalized portal page. Nowhere does *Rangan* disclose, teach, or even suggest that the web pages listed in the personalized portal page can be properly considered the method for storing personal web pages. The web pages themselves could not possibly be the method for storing the web pages. Moreover, even assuming for the sake of argument that the web pages listed in the personalized portal page could be properly considered the method for storing personal web pages, *Rangan* would still fail to disclose, teach, or suggest *searching, by the portal-page service installed at the gateway, for the web pages listed in the personalized portal page*, as recited in independent Claims 1 and 9. As discussed above, *Rangan* fails to disclose, teach, or suggest *the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *searching, by the portal-page service installed at the gateway, for the web pages listed in the personalized portal page*.

Fourth, *Rangan* fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway, a user interface for the method for storing personal web pages installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9. As discussed above, *Rangan* fails to disclose, teach, or suggest

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a portal-page service, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway, a user interface* for the method for storing personal web pages, as recited in independent Claims 1 and 9. Moreover, nowhere does *Rangan* disclose, teach, or suggest that the method for storing personal web pages is *installed at the gateway*, as recited in independent Claims 1 and 9. As discussed above, the method for storing personal web pages in *Rangan* merely includes portal software at a server providing a user a personalized portal page that contains links to listed web pages. The server in *Rangan* resides at an ISP separate from any gateway routers. Furthermore, as discussed above, *Rangan* fails to disclose, teach, or suggest that the method for storing personal web pages in *Rangan* is *identified as a result of the searching*, as recited in independent Claims 1 and 9.

Fifth, *Rangan* fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway, a portal-page* for the method for storing personal web pages *installed at the gateway identified as a result of the searching based on the user interface generated for the method for storing personal web pages installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9. As discussed above, *Rangan* fails to disclose, teach, or suggest a portal-page service, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway, a portal-page* for the method for storing personal web pages, as recited in independent Claims 1 and 9. *Rangan* also necessarily fails to disclose, teach, or suggest *generating a portal-page* for the method for storing personal web pages *based on the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9. Moreover, as discussed above, *Rangan* fails to disclose, teach, or suggest that the method for storing personal web pages is *installed at the gateway*, as recited in independent Claims 1 and 9. Furthermore, as discussed above, *Rangan* fails to disclose, teach, or suggest that the method for storing personal web pages in *Rangan* is *identified as a result of the searching*, as recited in independent Claims 1 and 9.

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For at least these reasons, the method for storing personal web pages in *Rangan* cannot be properly considered *a customer service*, as recited in independent Claims 1 and 9.

D The search function in *Rangan* cannot be properly considered *searching, by the portal-page service installed at the gateway, for the customer service installed at the gateway*, as recited in independent Claims 1 and 9. As discussed above, the search function in *Rangan* merely allows a user to run a keyword search on web pages listed in the personalized portal page. Nowhere does *Rangan* disclose, teach, or even suggest that the web pages listed in the personalized portal page can themselves be properly considered *a customer service*, as recited in independent Claims 1 and 9. Moreover, nowhere does *Rangan* disclose, teach, or suggest that the web pages listed in the personalized portal page are *installed at the gateway*, as recited in independent Claims 1 and 9. Instead, internet servers separate from any gateway routers host the web pages listed in the personalized portal page in *Rangan*. (Column 4, Lines 37-41 and 58-61; Column 5, Lines 41-45). For at least these reasons, the search function in *Rangan* cannot be properly considered *searching, by the portal-page service installed at the gateway, for the customer service installed at the gateway*, as recited in independent Claims 1 and 9.

E The interface of the Internet portal in *Rangan* cannot be properly considered *a user interface for the customer service installed at the gateway identified as a result of the searching based on the customer service installed at the gateway identified as a result of the searching* as recited in independent Claims 1 and 9 unless *Rangan* at least discloses every one of the following limitations:

- *generating, by the portal-page service installed at the gateway, the interface of the Internet portal for the customer service installed at the gateway identified as a result of the searching based on the customer service installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9; and
- *generating, by the portal-page service installed at the gateway, a portal-page for the customer service installed at the gateway identified as a result of the searching based on the interface of the Internet portal generated for the customer service installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9.

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Rangan fails to disclose, teach, or suggest any of the above limitations recited in independent Claims 1 and 9, much less every one of the above limitations.

First, *Rangan* fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway*, the interface of the Internet portal *for the customer service installed at the gateway identified as a result of the searching based on the customer service installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9. As discussed above, *Rangan* fails to disclose, teach, or suggest *a portal-page service*, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway*, the interface of the Internet portal. Moreover, as further discussed above, *Rangan* fails to disclose, teach, or suggest *a customer service*, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *generating the interface of the Internet portal for the customer service installed at the gateway identified as a result of the searching based on the customer service installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9.

Second, *Rangan* fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway, a portal-page for the customer service installed at the gateway identified as a result of the searching based on the interface of the Internet portal generated for the customer service installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9. As discussed above, *Rangan* fails to disclose, teach, or suggest *a portal-page service*, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway a portal-page for the customer service installed at the gateway identified as a result of the searching based on the interface of the Internet portal generated for the customer service installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway*. Moreover, as further discussed above, *Rangan* fails to disclose, teach, or suggest *a customer service*, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *generating a portal-page for the*

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customer service installed at the gateway identified as a result of the searching based on the interface of the Internet portal generated for the customer service installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway, as recited in independent Claims 1 and 9.

For at least these reasons, the interface of the Internet portal in *Rangan* cannot be properly considered *a user interface for the customer service installed at the gateway identified as a result of the searching based on the customer service installed at the gateway identified as a result of the searching*, as recited in independent Claims 1 and 9.

F The Internet portal in *Rangan* cannot be properly considered *a portal-page for the customer service installed at the gateway identified as a result of the searching based on the user interface generated for the customer service installed at the gateway identified as a result of the searching and the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9. As discussed above, *Rangan* fails to disclose, teach, or suggest *a portal-page service*, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *generating, by the portal-page service installed at the gateway*, the Internet portal, as recited in independent Claims 1 and 9. *Rangan* also necessarily fails to disclose, teach, or suggest *generating* the Internet portal *based on the portal-page service installed at the gateway*, as recited in independent Claims 1 and 9. Moreover, as further discussed above, *Rangan* fails to disclose, teach, or suggest *a customer service*, as recited in independent Claims 1 and 9. Therefore, *Rangan* also necessarily fails to disclose, teach, or suggest *generating* the Internet portal *for the customer service*, as recited in independent Claims 1 and 9. *Rangan* also necessarily fails to disclose, teach, or suggest *generating* the Internet portal *based on the user interface generated for the customer service*, as recited in independent Claims 1 and 9. For at least these reasons, The Internet portal in *Rangan* cannot be properly considered *a portal-page for the customer service installed at the gateway identified as a result of the searching based on the user interface generated for the customer service installed at the gateway identified as a result of the*

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searching and the portal-page service installed at the gateway, as recited in independent Claims 1 and 9.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987); M.P.E.P. ch. 2131 (Rev. 1, Feb. 2003) (quoting *Verdegaal Bros.*, 2 U.S.P.Q.2d at 1053). Moreover, "the identical invention must be shown in as complete detail as is contained . . . in the claim." *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989); M.P.E.P. ch. 2131 (Rev. 1, Feb. 2003) (quoting *Richardson*, 9 U.S.P.Q.2d at 1920). Furthermore, "[t]he elements must be arranged as required by the claim." *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990); M.P.E.P. ch. 2131 (Rev. 1, Feb. 2003) (quoting *In Re Bond*, 15 U.S.P.Q.2d at 1566). As shown above, *Rangan* fails to disclose, either expressly or inherently, each and every limitation recited in independent Claims 1 and 9, as required under the M.P.E.P. and governing Federal Circuit cases.

For at least these reasons, independent Claims 1 and 9 are patentably distinct from *Rangan*. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 1 and 9 and all their dependent claims, which are allowable at least by virtue of their dependencies from allowable independent claims.

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CONCLUSION

For at least the foregoing reasons, Applicants respectfully request reconsideration and allowance of all pending claims.

If the Examiner believes that a telephone conference would advance prosecution of this Application, the Examiner is invited to call the undersigned attorney for Applicants at (972) 718-4800.

Applicants believe no fee is due. To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. The Commissioner is hereby authorized to charge any fee and credit any overpayment to Deposit Account No. 07-2347 of Verizon.

Respectfully submitted,

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